

## **EXHIBIT 68**

### **Declaration of Rye Barcott**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR  
ADMISSIONS, INC.,**

**Plaintiff,**

**v.**

**UNIVERSITY OF NORTH  
CAROLINA et al.,**

**Defendants.**

**DECLARATION OF RYE BARCOTT**

## DECLARATION OF RYE BARCOTT

I, Rye Barcott, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

### Experience

1. I am a White male and a graduate of The University of North Carolina at Chapel Hill ("UNC-CH"). I graduated from UNC-CH in 2001 with degrees in Peace, War, and Defense and International Studies. After serving for five years on active duty in the Marine Corps, I received a Master of Public Administration (MPA) and a Master of Business Administration (MBA) from Harvard University.

2. My first calling was to serve in the Marine Corps. My dad served in the Marines and served in Vietnam. Growing up in Rhode Island, my earliest mentors were my dad and his friends, and I saw the Marine Corps as a path toward service and making a difference.

3. At UNC, I was in the Reserve Officers' Training Corps (ROTC) program. The ROTC program provides a scholarship for four years in exchange for a certain amount of full time service after graduation, so I went to UNC on a full scholarship. My parents are both graduate school alumni of UNC.

4. At Carolina, I formed Carolina for Kibera (CFK), a non-governmental organization that uses a model of participatory development to break cycles of violence and develop leaders in the Kibera slum of Nairobi, Kenya.

5. After I left UNC and completed my military service, I pursued a career in business and entrepreneurship. I co-founded Double Time Capital, a company that

finances clean energy projects, with a fellow marine. In 2010, I wrote a book for students titled *It Happened on the Way to War: A Marine's Path to Peace* about founding Carolina for Kibera (CFK) and my time in the Marine Corps.

6. I am still connected to UNC-CH through CFK. CFK is a major affiliated entity of UNC-CH, and Ron Strauss, the Executive Vice Provost and Chief International Officer at UNC, serves on the CFK board of directors. CFK is housed in the FedEx Global building. CFK sends student volunteers over to Kibera each year to conduct research and perform service activities. I am also on the board of the UNC Institute for the Environment.

#### **Experience at UNC-CH**

7. I had a tremendous experience at UNC-CH. The breadth of resources available at the University is breathtaking. As a large public university, its real strength is its diversity in so many respects—socioeconomic status, race, ethnicity, nationality, world view (conservative, liberal, moderate, you name it). Within the ROTC program, there was also significant diversity across all of those spectrums.

8. In my experience, diversity is important for the classroom experience, as it exposes students to how others think. Diversity added to the richness of discussion in virtually every class I took at UNC.

9. One UNC professor, Jim Peacock in the Department of Anthropology, taught me that I should aspire to connect talent to opportunity. He said that no matter where you live, there is enormous talent but not necessarily opportunity. If you are not exposed to that truth, you take things for granted and miss opportunities for things that

have a tremendous impact, including on your own life. You only recognize that talent is universal but opportunity is not when you escape from your own comfort zone. That concept resonated with me and influenced my work with CFK.

10. Assuming my military experience would involve peacekeeping, I took anthropology classes to gain a better understanding of why ethnic violence happens. One of my anthropology professors challenged me, saying that if I wanted to understand ethnic violence, I needed to talk with people who have experienced it. I studied Swahili and applied for a Burch Fellowship, which is granted to students who self-design unconventional experiences around the world. I used my Burch Fellowship to travel to Kenya.

11. While in Kenya as a twenty year old college student, I visited Kibera, a slum in Nairobi, where I met the individuals that I co-founded CFK with, Tabitha Atieno Festo, a nurse, and Salim Mohamed, a community organizer. We created CFK to develop local leaders, catalyze positive change and alleviate poverty in the Kibera slum. We founded CFK to connect talent and resources.

12. CFK is a pioneer of the movement called participatory development, drawing recognition from Time magazine as a "Hero of Global Health" and interest from Melinda Gates, President Barack Obama, and other dignitaries, who have visited to see its practices in action.

13. Through CFK, we have impacted the health, economics and social opportunities for Kibera. CFK focuses on these areas, which are fundamental to personal and community growth. CFK is founded on the belief that for health, ensuring

that individuals can face each day with strength is essential for the health of the community; for social development, preparing youth for the future requires education both in school and outside of it; for economic growth, having secure finance creates a solid foundation to explore even more opportunities.

14. In a typical year, thousands visit our medical clinic – receiving flu vaccinations, HIV care, treatment and education, counseling, and reproductive health services. We’ve added handwashing stations and taught proper hand-washing techniques. We have instituted education programs, Daughters United for girls, an annual soccer tournament, jump rope program, community trash cleanups, and safe space groups. We have awarded school scholarships, employed youth as garbage collectors and recycling center employees, and trained small business owners in computer-based entrepreneurship training.

15. CFK provides meaningful opportunities for UNC students and others in the community to learn how others in the world live. For example, the UNC women’s soccer team hosted a fundraiser for Chapel Hill girls where they go through a series of stations to learn about Kibera. It helps broaden their understanding of the world. About half a dozen to a dozen students go to Kibera from UNC each year to do volunteer work.

16. CFK is a very unique program that would not have happened without UNC.

#### **Importance of Diversity**

17. Diversity is important to UNC because the core mission of the University is to educate young people from all over the world to be good citizens and effective agents

of change and to live healthy lives. The educational mission is about understanding your place in the world and how the world works. That requires being exposed to others.

18. Promoting the development of cross-cultural skills is important in the college experience to prepare students for lives and careers beyond UNC. We live in a global world with a global economy. Cross-cultural skills are also important from a military perspective, especially since the types of conflicts we face are increasingly counterinsurgency. The ability to understand how people think is the key to success in a military situation.

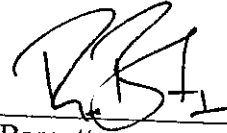
19. Diversity is basically a part of the military's fabric, and it makes the military stronger. It is just the natural reflection of America. Diversity gives us strength. Exposure to diversity and cross-cultural understanding is critical to effective military service.

### **Conclusion**

20. UNC provided me with wonderful opportunities that exposed me to different people, cultures and perspectives, and provided me with a strong foundation for a life of military and public service. I believe that, as in the military, diversity is part of UNC's fabric, and UNC's diversity is an essential part of the education UNC provides to its students.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 07/25/17.

A handwritten signature in black ink, appearing to be 'Rye Barcott', written over a horizontal line.

Rye Barcott